

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 05-cr-10226-RWZ
)	
SAMNANG AM,)	
Defendant.)	

MOTION TO SCHEDULE PRETRIAL CONFERENCE AND EXCLUDE TIME

The United States of America respectfully requests this Honorable Court to schedule an Initial Pretrial Conference and to exclude time under the Speedy Trial Act in the above captioned matter. In support of this motion, the government states as follows:

1. On June 7, 2006, Magistrate Judge Timothy Hillman issued a Final Status Report and returned this case to this Honorable Court.
2. As stated in the Final Status Report, the defendant has requested until July 13, 2006, to file motions to suppress and dismiss, and the government has requested three weeks to respond to any such motions. Magistrate Judge Hillman noted these requests in the Final Status Report, leaving the final briefing schedule up to this Honorable Court.
3. As further stated in the Final Status Report, the parties have jointly agreed and moved that all time from the Final Status Conference (June 6, 2006) through the filing of the government's response to any motions to suppress and/or dismiss be excluded under the Speedy Trial Act.

WHEREFORE, the government hereby respectfully requests that this Honorable Court (i) schedule an Initial Pretrial Conference at a time that is convenient for the Court, and (ii) exclude the requested time under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

July 7, 2006

By: /s/ *Lisa M. Asiaf*
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 7, 2006.

/s/ *Lisa M. Asiaf*
LISA M. ASIAF
ASSISTANT UNITED STATES ATTORNEY